

**CRINGLEFORD PARISH COUNCIL**  
**NEIGHBOURHOOD DEVELOPMENT PLAN 2013-2026**  
**CONSULTATION STATEMENT**

**Neighbourhood Planning Regulations 2012. Section 15(2) of Part 5 of the Regulations**

**APPENDIX**

**Consultation Responses June 2013**

**1. Norfolk County Council**

**Cringleford Neighbourhood Development Plan**

**Norfolk County Council Comments**

**June 2013**

**1. Preface**

- 1.1. The County Council welcomes the opportunity to comment on the above Plan and sustainable objectives set out in the document.
- 1.2. The officer-level comments below are made on a without prejudice basis.

**2. Infrastructure Delivery**

- 2.1. Policy SCC.1 – Welcome the amendments to the policy which reflects the County Council’s previous comments;
- 2.2. Policy SCC.7 - Welcome reference to library provision in this policy. However, for clarification the second sentence should read,  
  
“ This will be funded through either S106 or the Community Infrastructure Levy.”
- 2.3. If you have any queries please call Stephen Faulkner on 01603 222752 or email [stephen.faulkner@norfolk.gov.uk](mailto:stephen.faulkner@norfolk.gov.uk)

**3. Archaeology**

- 3.1. Policy GEN.2 – Reference to the “County Historic Heritage Record” should read “Norfolk Historic Environment Record”.
- 3.2. If you have any queries please contact Dr Ken Hamilton on 01362 869275 or email [ken.hamilton@norfolk.gov.uk](mailto:ken.hamilton@norfolk.gov.uk)

**4. Minerals and Waste**

- 4.1. Norfolk County Council in its capacity as the Mineral and Waste Planning Authority welcomes the inclusion within the text of the revised Cringleford Neighbourhood Plan that Mineral Safeguarding Areas occur within the plan areas, and that future planning applications within these areas will need to consider the requirements of CS16, where relevant.
- 4.2. Officer Contact: Mr Richard Drake (Minerals and Waste Policy)  
Tel No: 01603 222349 - email: [richard.drake@norfolk.gov.uk](mailto:richard.drake@norfolk.gov.uk)

## 2. Norfolk County Council – Richard Doleman

### 3. Plan Content and Status

The Neighbourhood Development Plan for Cringleford covers the whole of the civil parish. Its boundaries are clear and well established. A Neighbourhood Area has been designated and, in addition, a Development Area within that Neighbourhood Area has been defined where development will be acceptable. The Plan provides a vision for the future of the parish, agreed by residents following extensive consultation. It sets out the parish's objectives, together with the policies required for their realisation. Objectives and policies were formulated following an analysis of the natural environment of the parish, of the social and economic characteristics of its settled population and of the responses of residents and other interested parties to consultation. The introduction (Section 1) outlines how the relevant information was obtained, but the Evidence Base, upon which the Plan was formulated, is provided in a separate document to the Plan.

### 4. Plan Development

From the outset of the plan-making process, the Parish Council decided that the community would be involved as fully and as soon as possible. A Statement of Community Involvement was issued early in 2012. Public consultations had already taken place in October and November 2011. A questionnaire survey was carried out in March 2012. Some 330 questionnaires were returned; this is a response rate of 23.6%. Returns were also received from the Environment Agency, the Norfolk Wildlife Trust, Norwich City Council and the Pegasus Planning Group. Meetings were held with the Highways Agency and the Highways Authority (Norfolk County Council). Progress in plan making was reported to the monthly meetings of the Parish Council, in its regular newsletter, in a special Neighbourhood Development Plan newsletter and through the Church's Cringleford and Colney Parish News.

Potential developers have had an opportunity to present their ideas informally to Cringleford Parish Council.

An important part of the plan-making process was to test evolving policies against:

- National Planning Policy and Guidance
- The Joint Core Strategy *for Broadland, Norwich & South Norfolk* agreed by the Greater Norwich Development Partnership
- EU Legislation
- Human Rights Obligations
- Appropriate contribution to the achievement of sustainable development

The outcomes will be set out in a Statement of Basic Conditions, Cringleford Parish Council's Sustainability Appraisal and the Sustainable Environment Assessment carried out by South Norfolk Council.

## 7.6 Policies for Transport

Accessibility and ease of movement are essential not only to the economic and social life of the village but also to the integration of its community. The A11 through the village is a major barrier to community cohesion and pedestrian safety at the controlled crossing is of significant concern. Improvement in transport, however, will be shaped by the Highways Agency, the Highways Authority (Norfolk County Council) and the Joint Core Strategy. Relevant considerations include the expansion of Norwich Research Park in the neighbouring parish of Colney (4,700 new posts envisaged in 2013-26) and the construction of 2,200 new dwellings at Wymondham and 1,200 at Hethersett. Traffic flows through Cringleford are likely to increase, putting pressure on its existing infrastructure including, critically, the Thickthorn interchange (a scheme to be dealt with as a Highways National Significant Infrastructure Project). Colney Lane to Watton Road and the medieval Cringleford Bridge over the River Yare where peak-hour queues are of major concern to residents.

The Thickthorn Interchange improvements are critical to cater for the additional traffic arising from planned housing and science park growth in Cringleford and nearby areas. Developer contributions in finance or kind will help support the delivery of these much needed highway works. A co-ordinated approach to helping deliver necessary improvements by potential major housing developers in Cringleford would be far preferable to individual, piecemeal schemes and the production of a developer led Joint Transport Strategy in partnership with the relevant highways authorities would be a positive way forward to help deliver appropriate road improvements.

At present most parishioners use private cars for their travel needs, adding to traffic volumes, and increasing atmospheric pollution with its effects on climate. Two bus companies currently provide services to Cringleford and these will require improvement and enhancement as housing development progresses.

The significant improvements in public transport envisaged by the Joint Core Strategy must be provided, including a Bus Rapid Transit system connecting Wymondham, Hethersett and Cringleford to central Norwich, as planned by Norfolk County Council.

Consideration should be given to connecting the Bus Rapid Transit system to the employment hub consisting of the Norfolk and Norwich University Hospital, the University of East Anglia and the Norwich Research Park. Possibilities include use of the park-and-ride facilities at Thickthorn or the provision of an interchange at the intersection of Round House Way with the A11.

▼ Cringleford Bridge Junction with Inwood Road



## 7.3. Policies for Housing

Cringleford has an important part to play in the economic, social and cultural success of Norwich, which in turn has benefits for the district, county and region. People in Cringleford recognise this role. Our Neighbourhood Development Plan, and the policies it contains, set out how we think the demands that come with this role – particularly in relation to housing – can be accommodated positively. This means planning for growth, while ensuring that what is most special and distinctive about Cringleford, in terms of its heritage, natural environment and community bonds can be retained and indeed enhanced.

Of upmost importance is making sure that <sup>employment base</sup> future development helps Cringleford to grow stronger as a coherent, inclusive and intact community. Cringleford faces some distinct challenges in this respect. The village is right on the edge of the city of Norwich, adjacent to the Norwich Research Park (a major growth hub); it is traversed by the A11 and it has in recent times seen large scale development on a single site (Round House Park) of a higher density than elsewhere in Cringleford. When this development is complete the population of the village will have doubled. Many older people in our community wish to carry on living in Cringleford but may find it difficult to find suitable accommodation.

The Greater Norwich Development Partnership's Joint Core Strategy allocates a minimum of 1,200 dwellings to the parish. (This number is in addition to the 1,000 dwellings completed or in the course of construction at Round House Park). People in Cringleford are anxious to avoid their village becoming the location for large scale housing that serves the housing needs of Norwich, but does not take account of the established role and character of the village and makes it difficult to maintain a sustainable community – economically, environmentally and socially. The additional 1,200 dwellings allocated in the Core Strategy is the maximum number which parishioners consider compatible with their vision for sustainable development in Cringleford.

Our Neighbourhood Development Plan is, therefore, one for a village which will grow and play its part in meeting local housing need. It will be a village where residents are able to move about easily and feel a full part of the community at all life stages, integrating with their neighbours across the parish and able to avail themselves of services that reflect the community's full needs. Residents now and in the future should be able to enjoy living in a parish which has maintained the strong semi-rural and natural character that distinguishes it from more urban areas on its doorstep; and which is making a positive contribution to a low carbon economy.

The only major area of land available in Cringleford for development following the completion of Round House Park lies between the edge of the current built-up area (as at autumn 2012) and the Norwich Southern Bypass (A47), though a site has been offered west of the road which is partly in Cringleford, but largely in Hethersett (South Norfolk Site Specific Allocation Document Site 264). Windfall sites may also become available during the period covered by the Plan. The Cringleford section of Site 264 has been ruled out in the Cringleford Site Specific Allocation exercise (see Evidence Base). Of the remaining 121.16/121.29 ha\* around 74 ha will be needed for the green infrastructure envisaged in Section 7.2, leaving about 48 ha for

\*The difference in the figures is the result of a variation in the size of the total area given for Site 1021b (17.94 ha) and the area derived from adding the areas of the component parts Sites, 044 (8.37 ha) and Site 507 (9.44 ha).



### TRA1

New major estate roads should be designed to allow the free flow of traffic and development proposals should show how they integrate with other roads and the existing community. Measures to prevent obstruction to the route by parked cars should be included. *the site should be laid out to provide adequate car parking to service the estate of the new development. New link roads providing access to the main development sites west of Round House Way and Cantley Lane should be provided in the broad locations shown on the Proposals Map. cd*

Developers of land in the area will be expected to make an appropriate and proportional contribution or deliver improvements to the Thickthorn Interchange. Work will need to be undertaken with the Highway Authority and Highways Agency to show how this will be delivered. *The proposed map shows an area where a road will be built. The road should be a proposed road to be built. The road should not be a dedicated road. It can be shown that it is required to deliver an appropriate scheme.*

### TRA2

Integration of the village will be improved by the construction of new and enhanced walking and cycling routes between and within neighbourhoods, as required by the Joint Core Strategy. These should be incorporated in the major new development sites allocated and connect to the employment areas of the University of East Anglia, Norwich Research Park and Norfolk & Norwich University Hospital.

A footway/cycleway route must be incorporated into layout designs for land west of Round House Way to connect with the community facilities planned for Round House Park and those located in newer developments (see Proposals Map). The concept of 'Walking Neighbourhoods' (10 minutes walking distance or about 800m) must be used in locating new community facilities, including a school, medical centre and playing fields, and in the provision of public transport.

A controlled pedestrian crossing of Round House Way will be required.

### TRA3

Street systems in new neighbourhoods must be designed to minimise the use of private cars and accommodate the needs of pedestrians, cyclists and public transport. Wherever possible, shared-use footway/cycleway paths must be included in road designs, especially where these lead to major trip attractors.

For the convenience of users footway/cycleway routes must be clearly signed with destinations. Roads intended for vehicles must be clearly differentiated from footway/cycleway routes.

*TRA4*  
*Architectural*



### 3. South Norfolk Council



Anne Barnes  
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24 June 2013

Dear Mrs Barnes

#### **Cringleford Neighbourhood Plan: June 2013**

As noted in our original response, South Norfolk Council welcomes the opportunity to contribute to the preparation of the Cringleford Neighbourhood Development Plan as we consider this to be an important step forward in the development of neighbourhood planning in the district and the delivery of the Localism agenda.

South Norfolk Council is pleased to note that the wording of many of the policies has been revised in the light of discussions with us, and officers from Norfolk County Council and the Department for Communities and Local Government and that the document has been amended to incorporate a policy allocating land for the 1,200 dwellings in policy HOU1 and overarching policies in the General Policies section.

South Norfolk Council considers that the revised wording to policies in the Environment; Housing; Employment; Society, Community and Culture, and Transport chapters should ensure the policies are better able to deliver the Parish Council's aspirations. It is also noted that a development boundary has been incorporated into the Plan, as recommended in our original comments.

It is noted that the Plan continues to refer to a maximum of 1,200 new dwellings in policy HOU1 and sets a maximum density of 25 dwellings per hectare in policy HOU3. These figures are likely to come under scrutiny during the Examination, and the Parish Council will need to demonstrate clearly, with reference to the evidence, as to why no more than 1,200 dwellings can be delivered (the JCS reference is to a minimum of 1,200 dwellings in Cringleford) and why only such a low density should be permitted throughout the allocation with no exceptions (such as at points of high public transport accessibility).

Overall, however, South Norfolk Council supports the Parish Council in its aspirations and ongoing development of its Plan and raises no objections to the proposals contained within it.

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Yours sincerely



**Adam Nicholls**  
**Planning Policy Manager**

#### 4. CgMs On Behalf of Barratt Eastern Counties

BY EMAIL

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Mrs Anne Barnes

Clerk to Cringleford Parish Council

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NR4 6UE

20 June 2013

Dear Mrs Barnes,

##### **Representation to Cringleford Neighbourhood Development Plan (Revised Draft) on behalf of Barratt Eastern Counties**

We would like to thank the Parish Council for this opportunity to comment on the revised draft Neighbourhood Development Plan (NDP) published in June 2013. Since our representation on the first draft, the development team acting on behalf of Barratt Eastern Counties has continued its work in the preparation a planning application for the site known as Newfound Farm, Cringleford. We have sought to take into account the comments received at the public exhibition we held in March this year, and particularly to respond positively to comments made by the Parish Council. Our comments on the revised draft Neighbourhood Development Plan are set out below. While we welcome this consultation opportunity, we wish to question the tight consultation period – which has impeded the ability of the wider development team to comment on the revised document. We received the revised draft NDP on 5<sup>th</sup> June, but are informed that responses must be received by 23<sup>rd</sup> June. This is less than a 3 week consultation period. Our understanding of the relevant regulations is that a minimum consultation period of 6 weeks is required for consultation on the NDP. South Norfolk Council appear to share this view.

**GEN1** – We support the principle that the delivery of Cringleford's overall growth should show a coordinated approach between developers and relevant authorities to housing development and infrastructure.

**GEN2 & GEN3** – We support the protection, conservation and enhancement of heritage assets and their settings.

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**GEN4** – We cannot see the Cringleford Infrastructure Plan Programme in any Appendix. We therefore cannot comment in relation to any specific infrastructure requirements than may have been identified. However, we do support the principle that through CIL or Section 106 agreements, developers should contribute towards the infrastructure needs arising from their development.

**ENV1** – As previously, the principle of the retention and protection of a green landscape corridor adjacent to the A47 is supported. However, it is considered that given its purpose, the definition of this corridor should be based on an analysis of existing topography, landscape features and the question of inter-visibility rather than on the basis of a fixed width of 250m which can only be defined on an arbitrary basis. We must therefore object to the definition of a fixed 250m landscape corridor on the Proposals Map.

We also support the principle of the use of landscape planting and, if appropriate, created landforms, to minimise the visual impact of new development when viewed from main approaches and the wider countryside.

**ENV2** – We have no objection to this policy which proposes that developers must provide a tree belt within the identified 50m Gateway Zone on the A11. It is assumed



that this obligation would fall on the developers of the immediately adjacent sites which would be screened by such planting.

**ENV3** – We support the protection of those hedgerows indicated on the Proposals Map.

**ENV4** – We have no objection to the identified Protected Areas within which residential or economic development will be excluded.

**ENV5** – We support the principle of the use of sustainable drainage schemes.

**ENV6** – We support the principle that developments should provide well connected public open spaces and community woodland. We also support the principle that planting schemes should include appropriate native species.

**ENV7** – We have no objection to this policy which seeks to resist backland development in residential gardens.

**HOU1** – We support the NDP's recognition of Cringleford as a location that is identified in the adopted Joint Core Strategy for Broadland, Norwich and South Norfolk as a growth location. However, as previously pointed out by ourselves and South Norfolk Council, the Joint Core Strategy refers to the figure of 1,200 dwellings as a minimum. Unless it is backed by supporting evidence, the statement made in HOU1 referring to the figure as a maximum, is not compliant with strategic planning policy. With reference to the Proposals Map, we strongly support the identification of the site at Newfound Farm as part of the wider Housing Site Allocation Area.

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**HOU2** – We agree with the principles of this policy in respect of high quality layouts for new housing development.

**HOU3** – We object to this principle that building site densities should not exceed a maximum of 25 dwellings per hectare "across" the Housing Site Allocation Area. We would assume from the wording of the policy that the figure referred to is gross density, but that assumption would conflict with the supporting text on page 18 of the NDP which refers to net dwelling density. In either case, as a maximum density the figure is too low, and would conflict with Policy 1 of the JCS which requires developments to make the "most efficient appropriate use of land".

A higher quality of urban design and more efficient use of land is achieved by a mix of densities – some significantly higher than that proposed. This enables greater provision of landscaped areas and public open space, so achieving a higher quality to settlement form as a whole.

**HOU4** – We agree with the principle of a suitable mix of dwelling types and sizes to meet the breadth of housing needs across the community. However, the policy is misleading in its reference to JCS Policy 4 in stating that it requires that the majority of dwellings should be detached or semi-detached dwellings (houses and bungalows). Policy 4 does not state any such specific requirements.

We also consider that the background text which refers to a short term need across all tenures concentrated in the 3-4+ bedroom range, to be misleading. While evidence cited in the JCS does make it clear that 56% of short-term housing need is within this range, the JCS also clarifies that 33% of new dwellings should be 2-bedroom, and 17% 1-bedroom.

**HOU5** – We have no objection in principle to the provision of sheltered housing and a care home on the Housing Site Allocation Area as a whole. However, we do not propose to provide such as part of the development at Newfound Farm, as we are already proposing other works of wider public benefit including generous open space provision, allotments, a retail facility and land for a primary school with early years facility.

**HOU6** – We support the principle that all dwellings should be designed to minimise the use of energy and clean water through the application of a range of sustainable design principles, including the consideration of potential climate change.

**HOU7** – We object to the application of RIBA standards for internal space as a

minimum. While we accept that dwellings need to be designed to be functional and comfortable, we do not consider that it is appropriate for the policy to require that the amount of space provided in each dwelling must meet and preferably exceed the minimum standards recommended by RIBA in The Case for Space (2011). Such standards are not supported by strategic planning policy, and the RIBA document is intended as good practice guidance, not for the purposes of prescriptive regulation.

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**HOU8** – We object to the statement that proposals for rear or separate parking courts will not be permitted. We aspire to provide as much on-plot parking as reasonably possible, but 100% on plot parking or garage provision for all dwellings is not practical – neither in terms of making efficient use of land, nor in terms of highway requirements - which preclude the provision of driveways that would require reversing on-to or off the main distributor roads.

We seek to ensure that the location, layout and design of parking provision is carefully considered to promote security and discourage crime and anti-social behaviour.

We note that the third sentence included under the policy heading which refers to the problems encountered at Round House Park is an observational comment rather than a policy statement and as such would recommend that it is removed to an appropriate place within the supporting text.

**HOU9** – We object to this policy. While we do not wish to encourage fragmented communities, the dispersal of social housing in “small” groups throughout the development would not be expected to meet the requirements of effective management by a Housing Association.

**HOU10** – We agree with the principle of protecting Heritage Assets and their settings when development proposals are brought forward. However we would question if this policy is necessary, given that the need to protect heritage assets and their settings, is not specific to housing development, and there are similar points covered in GEN2 and GEN3.

**ECN1, ECN3, ECN4, ECN5** – We raise no objections to these policies.

**ECN2** – We specifically support this policy which facilitates the provision of local convenience (food) and/or small scale shopping facilities in Cringleford.

**SCC1** – While we do not object to the principle of providing a single site for a primary school, and indeed propose to provide one as part of the Newfound Farm development, we object to the specification that the site should be 2 hectares in size. Our own discussions with Norfolk County Council have confirmed that the site required for a suitable primary school, including early years facility, and its grounds is of 1.6 hectares in size. The policy should be amended accordingly. We do not consider it is necessary or appropriate for the Proposals Map to identify the specific location of the school site.

**SCC2** – We object to the statement that new developments should make appropriate provision for the increased demand for medical facilities including dentistry. Discussions with Cringleford Surgery and Norfolk Public Health team have confirmed that the existing surgery has sufficient expansion potential on site. Its extension in recent years was designed to facilitate further expansion as necessary, and the surgery manager is fully aware of the growth proposals for Cringleford. There are existing dental facilities on Earlham Road and Newmarket Road, Norwich at around 2km from the site.

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**SCC3** – We support the principle of providing new safe and convenient routes for walking and cycling within new development to encourage walking and cycling.

**SCC4** – We object to this policy which promotes environmentally sensitive construction methods and furnishing of community buildings, on the grounds that it is not a valid land use planning policy. It should be removed.

**SCC5** – While we support the principle of appropriate provision of public open space

to meet the demands arising from new development, we object to the specific requirement for a 3.8ha playing field within the Housing Site Allocation Area. We propose generous provision of open space at Newfound Farm but not formal playing fields or changing facilities. This is based on discussions with SNC concerning adopted policy requirements, and the identification of a concentration of existing formal publicly available playing fields from within 0.7km to around 1km of the site at Newfound Farm.

**SCC6** – We object to this policy which refers to specific requirements for the transmission speed of broadband infrastructure. It is not a valid land use planning policy. Its objectives lie outside the control of developers and the local planning authority. It should be removed.

**SCC7** – We object to this policy which refers to developers making provision for additional library facilities for the library service serving the development. While we do not dispute that contributions from s106 agreements, or in due course CIL, may be used to fund library facilities, it is not necessary or appropriate for specific reference to be made to such in a land-use planning policy.

**SCC8** – We support the principles of this policy which requires space to be set aside for the provision of allotments and a community orchard within allocated development areas to meet the expressed local need. As part of the Newfound Farm development we propose to provide an allotment area, although not in the location of the “possible site” shown on the Proposals Map. We do not propose to provide an orchard as such, although the proposed landscaping scheme could include native fruit trees amongst the mix of species.

**TRA1** – We agree with the principle of free flowing estate roads, which are well integrated with surrounding highways. However, we object to the proposal that new link roads should be provided in the broad locations on the Proposals Map. Suitable alternative solutions exist as advised by NCC and our own highways engineers. We have undertaken a technical assessment of highway access requirements for the site at Newfound Farm and have developed an access solution from Colney Lane. We consider that the highway access needs arising from adjacent development sites need to be considered on their own merits.

**TRA2** – We agree that integration of the village should be improved through the construction of new and enhanced walking and cycling routes, and specifically to the reference to the route which should be incorporated into layout designs for land west 6

of Roundhouse Way – linking ultimately to Roundhouse Park. We agree with the application of the principles of walkable neighbourhoods. However, we do not agree to provide any medical centre as part of the development, and object to this specific reference within the policy (see comments on SCC2). It is not supported by evidence. We also object to the specific reference to the provision of a controlled pedestrian crossing within the policy: NCC Highways engineers will need to determine what specific highways infrastructure is required.

**TRA3** – We agree that street systems in new neighbourhoods should be designed to minimise the use of private cars and accommodate the needs of pedestrians, cyclists and public transport.

### **Proposals Map**

Please note the comments made on the Proposals Map in respect of ENV1 (landscape corridor), ENV3 (protected hedgerows), HOU1 (residential site allocation), SCC8 (allotments), TRA1 (link roads).

In addition to those, we also wish to object to the proposed “50m zone either side of power lines unsuitable for commercial or residential development”. We can confirm that provided that a 30m swathe of land is left clear of development (15m either side of the 132kV overhead line), all relevant health and safety standards will be met. The identification of this zone should be removed from the Proposals Map. The alignment



of the overhead line and an appropriate clearance zone needs to be considered through the detailed masterplanning process undertaken by developers. Thank you for this opportunity to comment on the emerging Neighbourhood Development Plan for Cringleford. We look forward to further dialogue with you in due course.

Yours sincerely

**Chris Telford BSc (Hons), DipTP, MRTPI**

**Senior Associate Director**

## 5. Deloitte LLP On Behalf of Land Fund Limited

**Deloitte.**

Mrs Barnes  
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21 June 2013

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Dear Mrs Barnes

**Draft Cringleford Neighbourhood Development Plan - Revised Version June 2013:  
Representations on behalf of Land Fund Limited**

I write on behalf of my client, Land Fund Limited, in respect of the June 2013 updated version of the draft Cringleford Neighbourhood Development Plan (NDP) which has been published for consultation.

An earlier representation was submitted on behalf of my client in February 2013 as part of the previous phase of consultation. Whilst our client is still supportive of the wider principles within the draft NDP, there are a number of concerns that we have previously raised which have not been addressed or considered. Our comments relate primarily to ensuring that there is sufficient flexibility within the proposed policies to provide an appropriate basis upon which future development which has been identified for Cringleford can be brought forward.

**Housing Policies**

**Policy HOU1** identifies that a maximum of 1,200 new homes are to be developed in Cringleford.

This policy is contrary to the requirements of the Greater Norwich Development Partnerships Joint Core Strategy (JCS). The JCS clearly identifies that a minimum of 1,200 new dwellings are to be directed to Cringleford and also that some of the additional 1,800 new homes for South Norfolk may be directed to identified areas for growth (potentially to include Cringleford). It is important to note in this respect that Neighbourhood Development Plans cannot introduce a lower level of development than is set out in the adopted Local Plan (NPPF, paragraph 184). It is considered that this policy needs to be revised to recognise this minimum requirement and reflect the principle of supporting sustainable development as set out in the National Planning Policy Framework.

**Policy HOU2** sets out the requirements for design standards for any new development in Cringleford.

The proposed Policy retains much of the subjective language that was included in the first draft of the

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NDP. It is still considered that the wording of this policy needs to be amended to remove overly subjective wording along with references to policy aspirations which cannot be controlled through the planning system, for example, "allow for well managed front and rear gardens" and "appropriate lighting in houses".

**Policy HOU3** establishes the maximum density of new housing development at 25 dwellings per hectare.

As previously identified this is considered to be overly restrictive, particularly for an area which has been identified for growth.

Section 7.3 of the NDP sets out calculations which identify that 48ha of land will be sufficient to deliver the required 1200 houses at a density of 25 dwellings per hectare in this area. The calculations would result in exactly 1200 houses; however, this approach is considered to be overly simplistic. The calculations do not take into consideration any additional land required for ancillary or supporting uses (for example local shopping facilities, school and playing facilities) and physical constraints to development. It should also be noted that a number of recent appeal decisions made on behalf of the Secretary of State have emphasised the importance of making best use of land by achieving a higher average density across a scheme.

In addition to this, by adopting a low housing density, as is recommended in the draft NDP, this could limit the overall quality of design that can be achieved for new residential development and does not reflect different patterns of development that already exist in Cringleford.

It is considered that the Policy should be more flexible to allow for high quality design proposals to come forward and to ensure that the most effective use of land can be achieved. As a minimum a range of densities would be more appropriate.

#### **Proposals Map – Policy HOU3**

The proposals map set forward in the NDP presents further concerns in relation to the physical manifestation of Policy HOU3.

The assumptions used by the Parish Council, apparent in the proposals map, in regard to land available for housing development, appear to be overly simplistic. Much of the land designated for housing on the proposals map, for example, the small triangular parcels of land (identified in Appendix A) do not appear to be at a sufficient scale to make them attractive for development. It is also unlikely that the land to the west of the electricity pylons will be attractive to developers due to its nature and size (see Appendix A).

The Parish Council have not taken into consideration any physical constraints on the sites which may influence development that comes forward. The physical constraints we have identified are likely to reduce the overall provision of land identified in Policy HOU3 (48ha) thereby bringing into question the justification for the maximum housing density set forward.

We would therefore encourage the Parish Council to review their emerging NDP proposal map to ensure that the physical representation of the policies contained within the document are appropriate to meet the vision set out for Cringleford in the NDP and more importantly contribute to achieving the level of growth that is set out in the JCS.

**Policy HOU4** sets out a requirement for the majority of dwellings in any development proposal to be detached or semi-detached which the NDP states is in accordance with Policy 4 of the JCS.

It is unclear which part of the JCS Policy 4 is being referred to as being supportive of this requirement. The JCS, alongside national planning policy, requires housing developments to contribute to the mix of housing required for a balanced community. By requiring that the majority of dwellings to be detached or

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semi-detached not only is this contrary to the requirements of national and local Planning Policy, but the approach is not reflective of the evidence base which identifies that a mix of 1 – 4+ bedroom dwellings are required. Furthermore, this fails to take into consideration any of the current factors influencing housing policy currently, such as, opportunities for downsizing, affordability for first time buyers or the impact of welfare reforms on the social housing stock.

In order to ensure that the policy is suitably flexible to support future housing development, it is crucial that the NDP policy reflects the need to provide a housing mix that will meet the needs of the local community in accordance with the latest available evidence.

**Policy HOU8** establishes that garages must be built in direct association with the houses whose inhabitants may be expected to use them and prohibits the development of housing with rear or separate parking courts.

The Parish Council are seeking to prevent issues raised by on-street parking in inappropriate locations. In this respect it is considered that the NDP should seek to secure development that provides an appropriate level of parking provision. This could take the form of a combination of rear courtyards, garages and on-street parking provision. In some instances the requirement for a courtyard car park may be the only option available, for example, for developments with apartments. Therefore restricting this type of car parking provision could be counterproductive.

#### **General Policies**

**Policy GEN1** identifies the need for development proposals to show there is a co-ordinated approach between developers and relevant authorities to housing development and infrastructure.

This proposed policy is inappropriate and should be removed. The requirement to show a joined up and co-ordinated approach to development needs to be established in the local planning authority's Local Plan documents and the NDP. It is unreasonable to suggest that different developers and landowners have to adopt a co-ordinated approach and that a developer may be tied to decisions taken by another developer over which they have no control.

In terms of adopting a co-ordinated approach this has to be the responsibility of the local planning authority and in this case the Parish Council, either through development plans or by facilitating developer discussions.

**Policy GEN 2** refers to conservation of heritage assets and states that "any necessary work will be funded by the developers through appropriately worded conditions and/or Section 106 contributions".

This reference should be removed as it is unnecessary.

**Policy GEN4** establishes, in general terms, infrastructure associated with the development of any new site which must be provided directly by the developers or paid for through the Community Infrastructure Levy (CIL) or section 106 agreement contribution. The policy makes reference to the Cringleford Infrastructure Plan Programme which it references as an Appendix.

The Appendix referred to is not available with the draft NDP and as such the consultation cannot be considered robust. This has to be provided and should contain clear identification of what projects will be funded through CIL. The Parish Council will be fully aware that, as set out within the CIL regulations, any required infrastructure will have to be funded through CIL and that any top up payments required to be secured through a S.106 agreement would have to be directly related to the development and necessary to make the development acceptable in planning terms, and therefore should not be seen as a 'wish list' (see paragraph 15 of the Community Infrastructure Guidance below).

*"15. The charging authority should set out at examination a draft list of the projects or types of infrastructure that are to be funded in whole or in part by the levy. The charging authorities should also set out those known site-specific matters where section 106 contributions may continue to be sought. The principal purpose is to provide transparency on what the charging authority intends to fund in whole or part through the levy and those known matters where section 106 contributions may continue to be sought." (Community Infrastructure Guidance, DCLG, April 2013)*

It is also relevant to note that in identifying appropriate infrastructure requirement, the Parish Council will need to consider the viability of new development proposals and the impact that any financial contributions will have achieving the identified level of growth for Cringleford.

#### **Environmental Policies**

It is identified in section 7.2, 'Policies for the Environment', that the Parish Council will retain the Southern Bypass Protection Zone. It is noted that 69% of those responding to this subject on the consultation questionnaire were in favour of maintaining the Southern Bypass Protection Zone at a minimum width of 250m. In previous representations submitted on behalf of our client, the issue of the wording of this question has been raised. It is understood that this question could have been considered to be leading and therefore the weight to be attached to its conclusions limited. Furthermore, there is no consideration of the impact of the retention of this landscape protection zone on emerging development within Cringleford. This is important when considering the direction of development within Cringleford and meeting the vision for new development it integrate and connect with the existing residential community.

**Policy ENV1** establishes the allocation of a 250m Landscape Protection Zone from the edge of the development site to the edge of the A47 and indicates that the purpose of this zone is to maintain the landscaped setting of the village, mitigate traffic noise, maintain the existing wildlife corridor and maintain a strategic gap at the edge of the new development site and beyond towards Hethersett.

As previously identified it is unclear what evidence has been used to support the need for a 250 metre protection zone to the east of the A47. Section 1 of the NDP states that when identifying an appropriate width of the landscape protection zone, noise attenuation was determined 'without instruments' by the Parish Council. This is not a robust evidence base to support this recommendation. Whilst we recognise that noise is a particular concern for existing residents of Cringleford, it should be noted that it will be a requirement of any new development that comes forward within this zone to consider the potential impact of noise that will arise from new housing and provide measures to mitigate against this potential. It is therefore considered that the introduction of housing into this area will improve conditions for existing residents, either through any noise mitigation measures proposed as part of the new development or through the construction of new buildings which will also act as a barrier to noise. By leaving this area in its current form there will be no improvement to the current conditions and therefore the buffer zone will not deliver any additional benefits.

The emerging proposals for this area that are being developed by Land Fund have considered issues relating to noise, landscape and ecological constraints based on robust evidence. This has been used to inform the design proposals and mitigate against any potential impacts both from and on the proposed development.

One of the objectives of the protective zone identified in the plan is to reduce any potential impact on the strategic gap between Cringleford and Hethersett. Whilst we understand the Parish Councils concerns over reducing sprawl and maintaining Cringleford and Hethersett as two separate settlements, it is considered that this objective can be satisfactorily achieved through appropriate landscaping and the creation of a robust built edge to any further development proposed between Cringleford and the A47.

Furthermore, the Parish Council identify that in their view land to the east of the A47 becomes a publically accessible open space. At present this land is in private ownership and is used for agricultural purposes.

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It is therefore not accessible to the public. In order to allow this land to be released from its current use and deliver this significant public benefit this will have to be viable. The suggested zones for residential development, particularly to the south of the A11, do not provide a sufficient quantum of development to make the release of this land and any associated potential landscape improvements a viable option.

We understand that the Parish Council wishes to maintain a green buffer zone on the approach to Cringleford however it is considered that suitable landscaping provisions can be included within development proposals in order to achieve this without the need for a strict restriction to the development land available. In this respect it is considered that the policy should therefore be re-focussed on ensuring there is satisfactory provision of landscaping and a clear and robust boundary to the built environment, rather than restricting development through the use of a landscape protection zone.

**Policy ENV2** sets out the requirement of a 30-50m tree belt along the A11 approach into Norwich. The purpose of this tree belt is to provide screening to the road and the village and preserve the gradual transition from the countryside to the city.

There is no obvious evidence for the proposed width of tree belt when it appears to be required purely for screening purposes. As such this policy is considered to be overly prescriptive. Screening of any new development from the road could be easily achieved using a tree belt of a smaller width. However a more appropriate approach would be to encourage new development to be designed to ensure appropriate screening from the main roads but also to ensure that this forms part of a design led approach to ensure new development integrates with the existing residential area.

**Policy ECN1** restricts the development of additional business in Cringleford by suggesting that 'appropriate' development would be new businesses which employ up to 10 people. It explains that any proposal which exceeds this desired scale will be required to demonstrate that it will not have an unacceptable impact on residential amenity, transport networks and parking conditions or the environment.

It is not clear how this 'appropriate' level has been distinguished as there is no supporting evidence supplied to demonstrate that this policy is robust. Whilst it is important to ensure that there is no adverse impact on residential amenity from new employment generating development, the arbitrary '10 employees' test proposed is not supported by any evidence and would be very difficult, if not impossible, to enforce. More importantly this policy is in direct conflict with national guidance which requires planning policy to support sustainable economic growth.

**Policy SCC1** identifies a need for a 2ha site within the land allocated for development for the development of a new primary school with pre-school provision.

There is no evidence provided to support this plot size and the additional school provision required in this area. Furthermore, there is no consideration of whether the additional school places required would be more satisfactorily accommodated by expanding provision at the existing school. Robust evidence is required to ensure that this policy is sound.

**Policy SCC5** identifies that the developer should provide for a 3.8 hectare playing field to accommodate a cricket pitch, football pitches and pavilion to include changing rooms. It is unclear where the specific demand for the facilities has been identified. In order for this provision to be justified evidence must be provided which supports this requirement.

**Policy TRA1** requires that new major estate roads be included as part of any new housing development.

The proposal for these major new roads is contrary to an underlying principle of the NDP; creating an integrated community. In section 7.6 'Policies for Transport' the A11 is highlighted as a major barrier to community cohesion, it can therefore be assumed that the addition of new major estate roads would

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create a similar barrier and this policy is therefore unnecessary. As previously identified, development proposals should maximise the opportunities to utilise existing infrastructure and create neighbourhoods which are pedestrian friendly and support sustainable modes of transport.

**Conclusion**

As the Parish Council are aware Land Fund is currently preparing an outline planning application for the proposed residential led development of the land to the west of Cringleford. A collaborative design workshop, to which the Parish Council was invited to attend, was undertaken at the early stages of the preparation of this application to inform the proposals. Two public open sessions were held for and attended by members of the local community which allowed for feedback on the proposals and ideas about what to include to be incorporated into the proposals. As such, we consider that this has provided a very strong basis for the development proposals being brought forward and that it would be in the interest of the Parish Council to utilise the work that has been undertaken in this respect to further inform the preparation of the NDP. We would welcome the opportunity to meet with you to discuss our comments and the potential options for the site currently being developed in respect of the forthcoming planning application.

Should you wish to discuss any of our comments in more details or should you have any questions please don't hesitate to contact either James Adgey (0121 696 8504) or me. We look forward to hearing from you.

Yours sincerely



**Gary Cardin**  
for Deloitte LLP

**STATUTORY  
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<b>Name</b>	<b>Organisation</b>	<b>Address</b>	<b>Post Code</b>	<b>Job Title</b>
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## **List of Consultees**

### **Every dwelling house in the parish of Cringleford**

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4 Drovers Rest  
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**Cllr: Garry Wheatley** (Member for Cringleford)

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**Cllr: Judith Virgo** (Member for Cringleford)

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**Cllr: Caroline Ackroyd** (Member for Eaton)

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**Cllr: Judith Lubbock**

(Member for Eaton)

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**Cllr: James Wright**

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**East Carleton with Ketteringham Parish Council**

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**Hethersett Parish Council**

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**Keswick & Intwood Parish Council**

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**Cub Leader**

Mr S Martin  
C/O Mr Younger

**Beavers Scout Leader**

Mr M. Younger

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**Brownie Leader Girls Age 7-10**

Mrs Penny Pullinger

**Rainbows Girls Age 5-7**

Mrs Paula Bourthis



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**Cringleford Singers**

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**Mr Roger Bond**

Director – Estates and Buildings  
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**Food Research Institute**

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**Anglian Buses**

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